

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

DELUX PUBLIC CHARTER, LLC d/b/a JSX
AIR and JETSUITEX, INC.; XO GLOBAL, LLC;
and BLADE URBAN AIR MOBILITY, INC.,

Plaintiffs,

v.

COUNTY OF WESTCHESTER,

Defendant.

Civil Action No.: 7:22-cv-01930 (PMH)

**PLAINTIFFS' NOTICE OF MOTION FOR VACATUR PURSUANT TO
FEDERAL RULE OF CIVIL PROCEDURE 60(b)(2) AND 60(b)(6)**

PLEASE TAKE NOTICE that Plaintiffs Delux Public Charter, LLC d/b/a JSX Air and JetSuiteX, Inc.; XO Global, LLC; and Blade Urban Air Mobility, Inc., respectfully move based upon the accompanying memorandum of law for an order, pursuant to Fed. R. Civ. P. 60(b)(2) and 60(b)(6), granting relief to Plaintiffs from the judgment entered on July 1, 2024, *see* ECF 120; ECF 121, and awarding Plaintiffs such further and additional relief as the Court may deem just and proper.

Oral argument is requested.

Dated: March 28, 2025

Jonathan B. Nelson
Paul J. Noto
DORF NELSON & ZAUDERER LLP
555 Theodore Fremd Ave.
Rye, New York 10580
(914) 381-7600
jnelson@dorflaw.com
pnoto@dorflaw.com

Respectfully submitted,

/s/ Jonathan F. Cohn
Jonathan F. Cohn
LEHOTSKY KELLER COHN LLP
200 Massachusetts Ave., NW
Washington, DC 20001
(512) 693-8350
jon@lkcfirm.com